

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

Robert W. Johnson, Plaintiff(s)  
vs.  
Best Western Plus & Indeed, Defendant(s)

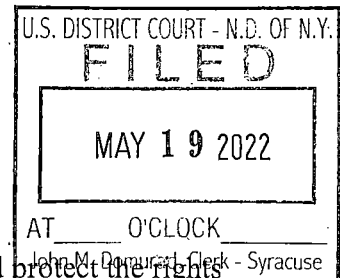
Civil Case No.: 5:22-cv-526  
(DNH/ATB)  
CIVIL  
RIGHTS  
COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983

Plaintiff(s) demand(s) a trial by: X JURY \_\_\_\_\_ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.



PARTIES

2. Plaintiff: Robert W. Johnson  
Address: 112 COURT ST: APT. 2  
WATERTOWN, NY 13601

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Best Western Plus  
Address: 6605 Old Collamer Road South  
East Syracuse, NY 13057  
315-463-6443  
Official Position: Corporation

b. Defendant:

Official Position:

Address:

Indeed

Corporation

7501 N. Capital of Texas Highway  
Austin, TX 78731  
203-328-2691

c. Defendant:

Official Position:

Address:

Additional Defendants may be added on a separate sheet of paper.

4.

#### FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

**Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).**

I, Robert W. Johnson, was denied employment and employee/employer policy records by Best Western Plus and, Indeed. All parties are Pro Se, Corporation and violated Robert W. Johnson Due Process Rights.

5.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

Best Western Plus discriminated against Robert W. Johnson and denied Robert W. Johnson, Employee/ Employer Policy records and Due Process Rights for Employee Applicants.

SECOND CAUSE OF ACTION

Indeed falsified ads and employment and Robert W. Johnson was not afforded policy records, fair hearings and employee incentives for future employment.

THIRD CAUSE OF ACTION

Best Western Plus and Indeed violated Pro Se Corporation laws governing potential employees and deny any wrongdoings and or discriminatory practices.

6. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

\$100,000,000.00 for punitive damages;  
Employment; Sanctions; All other  
Reliefs Just & Proper.

I declare under penalty of perjury that the foregoing is true and correct.

DATED:

05/17/2022

Robert W. Johnson  
Robert W. Johnson  
Signature of Plaintiff(s)  
(all Plaintiffs must sign)

02/2010